

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

VRB 4 Investments Ltd.

Plaintiff	Case Number
vs.	23-cv-5287
Bolivarian Republic of Venezuela	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Pharo Gaia Fund, Ltd., Pharo Macro Fund,  
Ltd., and Pharo Trading Fund, Ltd.

Plaintiff	Case Number
vs.	20-cv-8497
Bolivarian Republic of Venezuela	
Defendant	

## Status of Earlier Filed Case:



Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)



Open

(If so, set forth procedural status and summarize any court rulings.)

Case filed in October 12, 2020, and on October 15, 2020, was accepted as related to Casa Express Corp v. Bolivarian Republic of Venezuela, 1:18-cv-11940-AT. The case is now closed following entry of default judgment against the Bolivarian Republic of Venezuela on October 25, 2021. There is no appeal pending.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This case, like Pharo Gaia, is one of several breach-of-contract actions against the Bolivarian Republic of Venezuela involving the enforcement of sovereign debt obligations issued by the Republic and encompassing most of the same series of bonds. Both actions involve common issues of law and fact. Hearing these cases together is necessary to avoid conflicting orders regarding the enforceability of the Republic's debt. It would also avoid a substantial duplication of effort, and expense, delay, or undue burden on the Court, the parties, and witnesses. Venezuela has acknowledged that breach of contract actions against it regarding its sovereign debt are related actions by filing a statement of relatedness to that effect. See Statement of Relatedness, Pharo Gaia Fund, Ltd. v. Bolivarian Republic of Venezuela, No. 19-cv-3123 (Apr. 8, 2019), ECF No. 3.

Signature: /s/ Brandon L. Arnold Date: 06/22/2023

Kramer Levin Naftalis & Frankel LLP

Firm: \_\_\_\_\_